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Attorneys for Bank of America, N.A.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

**MARC JOHN RANDAZZA,

Debtor.**

Case No. 15-14956-abl

Chapter 11

**VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS
CASE ONLY BY ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT**

Timothy R. Wheeler, Petitioner, respectfully represents to the Court:

1. That petitioner resides in Caldwell, New Jersey.
2. That Petitioner is an attorney at law and of counsel of the law firm of Wilson Elser Moskowitz Edelman & Dicker LLP with offices at 200 Campus Drive, Florham Park, New Jersey 07932, Tel.: 973-624-0800.
3. That Petitioner has been retained personally or as of counsel of the law firm by Bank of America, N.A. to provide legal representation in connection with the above-captioned case now pending before this Court.
4. That since 2003, Petitioner has been and presently is a member in good standing of the bar of the highest Courts of the States of New Jersey and New York, where Petitioner regularly practices law.
5. That Petitioner was admitted to practice before the following United States

District Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

	Date Admitted
District of New Jersey	2003
Southern District of New York	2004
Eastern District of New York	2004
Northern District of New York	2004
Western District of New York	2009

6. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below: None.

7. That Petitioner has never been denied admission to the State Bar of Nevada.

8. Petitioner or any member of Petitioner's firm (or office if firm has offices in more than one city) with which Petitioner is associated has/have filed application(s) to appear as counsel under Local Rule IA 10-2 during the past three (3) years in the following matters:

Date:	Name:	Cause:	Court:	Status:
2/26/15	Mark C. Severino William J. Katt Stephen L. Nelson	<i>Commerce v. Starwood</i> 2:12-cv-01219-APG-CWH	District Court	Granted
2/15/13	Rosario M. Vignali	<i>Brown v. Techtronic Industries</i> 2:12-cv-01947-MMD-NJK	District Court	Granted
10/1/12	William J. Kelly Peter J. Larkin Benjamin A. Tulis	<i>Delaware PERS v. KPMG</i> 2:12-cv-00961-JCM-GWF	District Court	Granted
7/21/15	Daniel F. Flores Timothy R. Wheeler	<i>In re The Gun Store</i> 15-13989-abl	Bankruptcy Court	Granted
2013	Matthew L. Elkin William J. Kelly Peter J. Larkin	<i>ShengdaTech Trust v. KPMG et al.</i> , 13-cv-00563	District Court	Granted
7/9/14	Jeremy Schneider Yoora Pak	<i>Shinabargar v. Bd. Of Trustees</i> 3:14-cv-00072-MMD-WGC	District Court	Granted
7/24/13	Patrick M. Kelly Carey B. Moorehead	<i>USF Insurance Company v. Smith's Food and Drug Center, Inc.</i> , 2:10-cv- 01513-MMD-VCF	District Court	Granted

Petitioner has conducted a search of his firm's document database and has identified the above applications filed during the past three (3) years. Petitioner will supplement this list as necessary should additional information become available.

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR THE PURPOSES OF THIS CASE ONLY.

DATED: October 2, 2015



Petitioner's Signature

STATE OF NEW JERSEY)
)
COUNTY OF MORRIS)

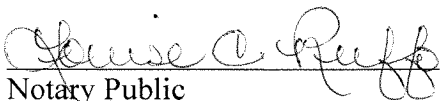
Timothy R. Wheeler, Petitioner, being first duly sworn, deposes and says:
That the foregoing statements are true.



Petitioner's Signature

(SEAL)

Subscribed and sworn before me this
2nd day of October, 2015



Notary Public

LOUISE C. RUFFO
A Notary Public of New Jersey
My Commission Expires 2/3/2019